ATC ASSOCIATES INC.

476

Jalk Fee

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26 June 2002
42.11378.0006-T6

U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Via FedEx

Attention: Mr. Matt Mitguard
M/C SFD9-2

SUBJECT: FULTON WELLS PROPERTY AT 10623 FULTON WELLS IN SANTA FE SPRINGS, CALIFORNIA 90670

Dear Matt:

Thank you for taking the time to meet with me. This letter is written on behalf of the SFS Norwalk, LLC as a follow-up to our meeting regarding the Fulton Wells property that is located at 10623 Fulton Wells in Santa Fe Springs, CA (Figure 1). SFS Norwalk, LLC is the owner of the Fulton Wells property.

The Fulton Wells property is adjacent to the Comprehensive, Environmental Response, Compensation, and Liability Information System- (CERCLIS-) listed property referred to as the Jalk Fee Lease at 10607 Norwalk Boulevard in Santa Fe Springs, CA. The United States Environmental Protection Agency (USEPA) ID number for the Jalk Fee Lease property is CA0000024554. It is ATC's understanding that the Jalk Fee Lease's CERCLIS listing is based on concerns with regard to chlorinated volatile organic compounds (VOCs).

The Fulton Wells property is a separate legal parcel (from the Jalk Fee Lease property) that has been redeveloped with a newly completed warehouse/distribution facility. A photograph of the site building is shown in Figure 2. Active sale negotiations are underway with an owner/user ready to purchase the property and occupy the site.

In order for this redevelopment and utilization of the Fulton Wells property to proceed, it is important that its environmental status with regard to the Jalk Fee Lease be clarified. This letter presents information in support of a request that the USEPA issue a "Comfort Letter" consistent with the guidelines in USEPA document 330-B-98-001; e.g., The USEPA does not consider the Fulton Wells property to be a part of the adjacent CERCLIS-listed Jalk Fee Lease property and that, based on the information provided, the USEPA does not anticipate the need to take any investigatory, remedial, or enforcement action against the Fulton Wells property as long as the provided information is accurate and/or conditions not previously known to the USEPA regarding the Fulton Wells property are discovered.

INFORMATION IN SUPPORT OF COMFORT LETTER REQUEST

Fulton Wells Property Definition

The Fulton Wells property is 2.45 acres with access from Fulton Wells (no avenue or street designation). The location of the property is shown on the Parcel Map No. 26418. A copy of the parcel map is enclosed (Attachment 1). The site location is shown on Figure 3. The legal property description (in Los Angeles County) is as follows:

> PARCEL 1, IN THE CITY OF SANTA FE SPRINGS, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS SHOWN ON PARCEL MAP NO 26148 AS FILED IN BOOK 303, PAGES 5 AND 6 OFR PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY

SFS Norwalk, LLC acquired ownership of the Fulton Wells property effective 21 August 2001. Redevelopment of the property by SFS Norwalk, LLC, as a warehouse/distribution facility, commenced in October 2001 and has recently been completed.

Historical Use, Characterization, and Remediation of the Fulton Wells Property

Historically the Fulton Wells property was part of an oil field operated by Hathaway Oil Company and owned by the Mobil Foundation. Oil-field operations' features included two oil wells, a tank battery (comprised of up to 12 small to medium size (2,000- to 20,000-gallon capacities), aboveground storage tanks [ASTs] that held primarily crude oil and water generated during oil-field pumping), below grade piping, and an area referred to as the "boneyard".

In 1991 the boneyard was characterized by Levine*Fricke. Historically the boneyard was described as an area of approximately 150 feet by 150 feet where metal objects were stored. It was described as being in the southern part of what is now the Fulton Wells property. Characterization of the boneyard area included analysis for heavy metals and VOCs. No elevated concentrations of chlorinated VOCs were reported. Elevated concentrations of selected heavy metals (copper, lead, and zinc) were reported. The area was then excavated, confirmation soil sampling was conducted and the boneyard area was backfilled. The boneyard work was done with regulatory agency oversight (as part of a voluntary compliance program [VCP]) by the State of California Department of Toxic Substances Control (DTSC). The DTSC issued a no further action (NFA) letter dated 23 December 1996.

In late 1999 and early 2000, as a part of a pending transaction involving the Fulton Wells property, soil sampling was initiated as a part of additional site characterization for the then-pending real estate transaction involving SFS Norwalk, LLC. Subsequently oil-field equipment (including piping and the tank farm ASTs) was removed, the oil wells were abandoned in accordance with State of California Division of Oil, Gas and Geothermal Resources guidelines (including excavation of at least the upper 10 to 15 feet of the soil around each oil well head so that the upper 10 feet of the casing could be cut off and the casing could be capped), excavation and off-site disposal of petroleum-impacted soil at a State-licensed disposal facility, confirmation soil sampling, and the monitoring of site soils for potential hazardous substances during site grading. Virtually the entire Fulton Wells property was exposed to a depth of 3 to 5 feet below

ground surface (bgs) during removal of oil field piping. The entire site was subsequently over excavated during site grading to a depth of 1 to 5 feet bgs prior to the placement of engineered fill. Site characterization and petroleum hydrocarbon impacted soil remediation work was conducted under the oversight of the Santa Fe Springs Fire Department (SFSFD). The SFSFD subsequently issued a NFA letter as discussed further below.

Absence of Sources of Chlorinated VOCs

No sources of chlorinated VOCs have been reported or found at the Fulton Wells site. Soil sampling and analysis has been conducted by a number of consultants at the site. Because there were no obvious sources of chlorinated VOCs, the analyses for chlorinated VOCs were conducted in the northern part of the site where oil well excavations and the former tank battery were located. The enclosed Figure 3 shows the sample locations that ATC is aware of where chlorinated VOC analyses were conducted (Attachment 2 includes the data that were used to compile this figure). These include 39 soil samples on-site and three additional samples immediately off site (adjacent to abandoned oil well Jalk 117). In all of the samples with the exception of one, the concentrations of chlorinated VOCs were below the laboratory reporting limit. A soil sample (SS-1) collected by Levine*Fricke in 1991 (as reported by McLaren/Hart in their 20 September 1996 report) at a depth of approximately 4.5 feet bgs had a tetrachloroethene (PCE) concentration of 0.037 parts per million (ppm) which is equivalent to milligrams per kilogram (mg/kg) and no reported trichloroethene (TCE) concentration (above the laboratory reporting limit). This isolated concentration of PCE is not considered significant. Soil samples collected by McLaren/Hart approximately five feet west of this sample location at depths of 5 and 10 feet bgs had no detectable concentrations of PCE or TCE. Additionally, a soil sample (SS-2) collected by Levine*Fricke approximately 30 feet east of location SS-1 at a depth of approximately three feet bgs had no detectable concentration of PCE or TCE.

Because the primary concern during characterization was petroleum hydrocarbons, there are a number of sample locations where analyses were conducted primarily for petroleum hydrocarbons. However, no field indicators of VOCs (such as elevated organic vapor meter [OVM] readings and/or odors) were encountered where those soil samples were collected across the site.

Sampling and Analytical Methodology and Protocols

Proposed boring/sample locations selection methods, sample depth selection methods, soil sampling methods, soil sample transport, and soil sample analyses protocols were conducted consistent with USEPA Guidance Document SW-846. These included:

- Development of work plans for regulatory agency review and approval.
- During characterization borings were drilled in all known areas of reported potential source areas.
- During characterization borings were drilled in "background" areas.
- Site cleanup levels for chlorinated VOCs (if they were encountered) were established by the SFSFD using the USEPA preliminary remediation goals (PRGs) for industrial sites.
- Field screening techniques were used during soil sampling activities. These included the use of an OVM and visual examination for evidence of staining.

- At least one soil sample was selected at each boring/sample location for analysis by a State of California-certified environmental laboratory.
- Soil samples selected for VOC analysis were analyzed in general accordance with USEPA Method No. 8260 or 8260B.
- In excavations, soil samples were collected for analysis on each wall and the floor of the excavation.
- Soil samples were collected in accordance with standard procedures that were designed to minimize the loss of chlorinated VOCs during transport from the field to the laboratory. These included soil samples being collected by ATC either in brass, stainless steel, or acetate pre-cleaned liners whose ends were capped with Teflon material or aluminum foil and capped with plastic end caps. Sample containers were placed in ziploc-type bags following collection and stored in portable ice chests cooled to approximately 40 degrees Fahrenheit. Chain of custody procedures were used to document sample collection, transport, and delivery to the laboratory. Work conducted by others appears to have been similarly conducted.
- Soil samples were delivered to the laboratory within 48 hours of collection. Many were delivered the same day.
- Laboratory analytical protocols were based on the laboratories' State of California certification.

Groundwater

There are (or historically have been) three groundwater-monitoring wells that are on the adjacent former Jalk Fee Lease property. They are designated MMW-3, MMW-4, and MMW-5.

The closest of these groundwater monitoring wells is MMW-4 which is approximately 100 feet easterly of the southeast part of the Fulton Wells property (Figure 3). These groundwater monitoring wells were installed in 1994 by McLaren/Hart as part of an evaluation of oil field properties. They currently are monitored and sampled by others with State of California Regional Water Quality Control Board – Los Angeles Region (RWQCB) oversight.

The depth to groundwater in these three groundwater monitoring wells is reported to be approximately 62 to 67 feet bgs with a gradient toward the southwest.

Chlorinated VOCs have been detected in sampled groundwater from these off-site groundwater monitoring wells. Reports by others have cited off-site sources for the chlorinated VOCs in groundwater. These off-site sources include the Continental Heat Treating, Inc. (CHT) facility located southeast of the site at 10643 Norwalk Boulevard and sources northeast of the adjacent Jalk Fee Lease property.

The PCE concentrations in the sampled water from the upgradient groundwater monitoring well (MMW-3) on the adjacent property historically have been slightly below to slightly above the maximum contaminant level (MCL) for PCE; those of TCE have been somewhat higher than its MCL. In the cross-to-downgradient groundwater monitoring well (closest to the CHT facility), the concentrations of PCE and TCE historically have been substantially higher than those in the sampled water from groundwater monitoring well MMW-3.

The PCE and TCE concentrations in the sampled groundwater from the groundwater monitoring well closest to the Fulton Wells property (MMW-4) historically have been slightly less than those in the sampled groundwater from the upgradient groundwater monitoring well (MMW-3) and substantially less than those in the sampled groundwater from groundwater monitoring well MMW-5 adjacent to the CHT facility. These relationships are consistent with the absence of a source of chlorinated VOCs on the Fulton Wells property. In the judgment of ATC, they show that there is very little likelihood that the Fulton Wells property has contributed to the chlorinated VOC concentrations in the shallow regional groundwater.

Regulatory Agency Oversight and NFA Letters

Regulatory agency oversight for the characterization and remediation of the former boneyard area was the DTSC. Following excavation and off-site disposal of soil (because of elevated concentrations of selected heavy metals [copper, lead, and zinc]), the DTSC issued a NFA letter dated 23 December 1996. A copy of the letter is enclosed (Attachment 3).

Additional site characterization and soil remediation oversight was provided by the SFSFD. Following remediation (by excavation and off-site disposal of petroleum hydrocarbon-impacted soil (no chlorinated VOC-impacted soil was encountered on the Fulton Wells property), the SFSFD issued a NFA letter for the property that includes the Fulton Wells property and the adjacent 6.1 acres of the former Jalk Fee Lease. The SFSFD NFA letter is dated 20 March 2001. A copy of the letter is enclosed (Attachment 3).

The RWQCB reviewed the results of soil remediation and a risk assessment (and subsequent amendment) conducted by TRC Alton Geoscience dated 28 November 2000 (the amendment is dated 22 January 2001). The risk assessment and amendment addressed chlorinated VOCs and groundwater, primarily with regard to the adjacent 6.1 acres of the former Jalk Fee Lease. The RWQCB then issued a NFA letter dated 5 March 2001. A copy of the letter is enclosed (Attachment 3).

Fulton Wells Property Use Limitation

As a condition of issuance of a NFA letter, the SFSFD directed that a deed restriction be recorded. This was done in the Grant Deed. It reads:

THE PROPERTY IS CONVEYED TO GRANTEE SUBJECT TO:

(a) All liens, encumbrances, easements, covenants, conditions and restrictions of record; all matters which would be revealed or disclosed by an accurate survey or physical inspection of the Property;

(b) The following restrictive covenants. As part of the consideration for this conveyance, the Grantee for itself, its successors and assigns, covenants and agrees that from the date of this Deed:

(1) The Property shall be used for commercial, industrial, or office purposes only;
(2) Neither the Property nor any part thereof shall at any time be used for residential purposes, day care facilities, food preparation facilities, schools, or playgrounds;
(3) Irrigation and drinking water wells shall be prohibited; and
(4) Subsurface structures (including, without limitation, basements and below ground parking, but excluding building foundations and below ground utilities) are prohibited.

These restrictive covenants shall run with the land and are binding on the Grantee, Grantee's successors in title, and subsequent owners and lessees of the Property.

SUMMARY

In ATC's judgment, a Comfort Letter can be issued for the Fulton Wells property because:

1. The Fulton Wells property is separate and legally distinct property from the former Jalk Fee Lease property.

2. No sources of chlorinated VOCs were reported or found on the Fulton Wells property during the:
   - Environmental due diligence conducted as a part of the transactions involving the Fulton Wells property,
   - Numerous characterization investigations;
   - Piping removal across the site;
   - Examination, sampling and soil sample analysis in excavations of selected features during oil field decommissioning and demolition, boneyard excavation activities, and petroleum hydrocarbon impacted soil excavation activities; and
   - Site grading.

3. Elevated concentrations of chlorinated VOCs have not been found in any of the analyzed soil samples at the Fulton Wells property.

4. There are a number of off-site sources of chlorinated VOCs. These include the CHT facility located southeast of the site at 10643 Norwalk Boulevard, and sites to the northeast of the former Jalk Fee Lease.

5. Characterization and remedial activities at the Fulton Wells property have been conducted with regulatory agency oversight and/or evaluation including the State DTSC and RWQCB and the City's SFSFD.

6. NFA letters have been issued by the State and City regulatory agencies.

Based on this information we respectfully request that a Comfort Letter be issued to

SFS Norwalk, LLC
c/o The O'Donnell Group, Inc.
3 Civic Plaza, Suite 160
Newport Beach, CA 92660

Attention: Mr. Greg Chila

Because active sale negotiations are underway and are expected to be completed in 45 days and the CERCLIS listing is having a material impact on those negotiations and the productive use of the property, we would appreciate receipt of the Comfort Letter at the USEPA's earliest convenience – within 30 days of receipt of this letter if at all possible.

Thank you for your prompt attention to this matter. Please feel free to contact me at your convenience to discuss any information that we can provide to expedite the issuance of the requested Comfort Letter.

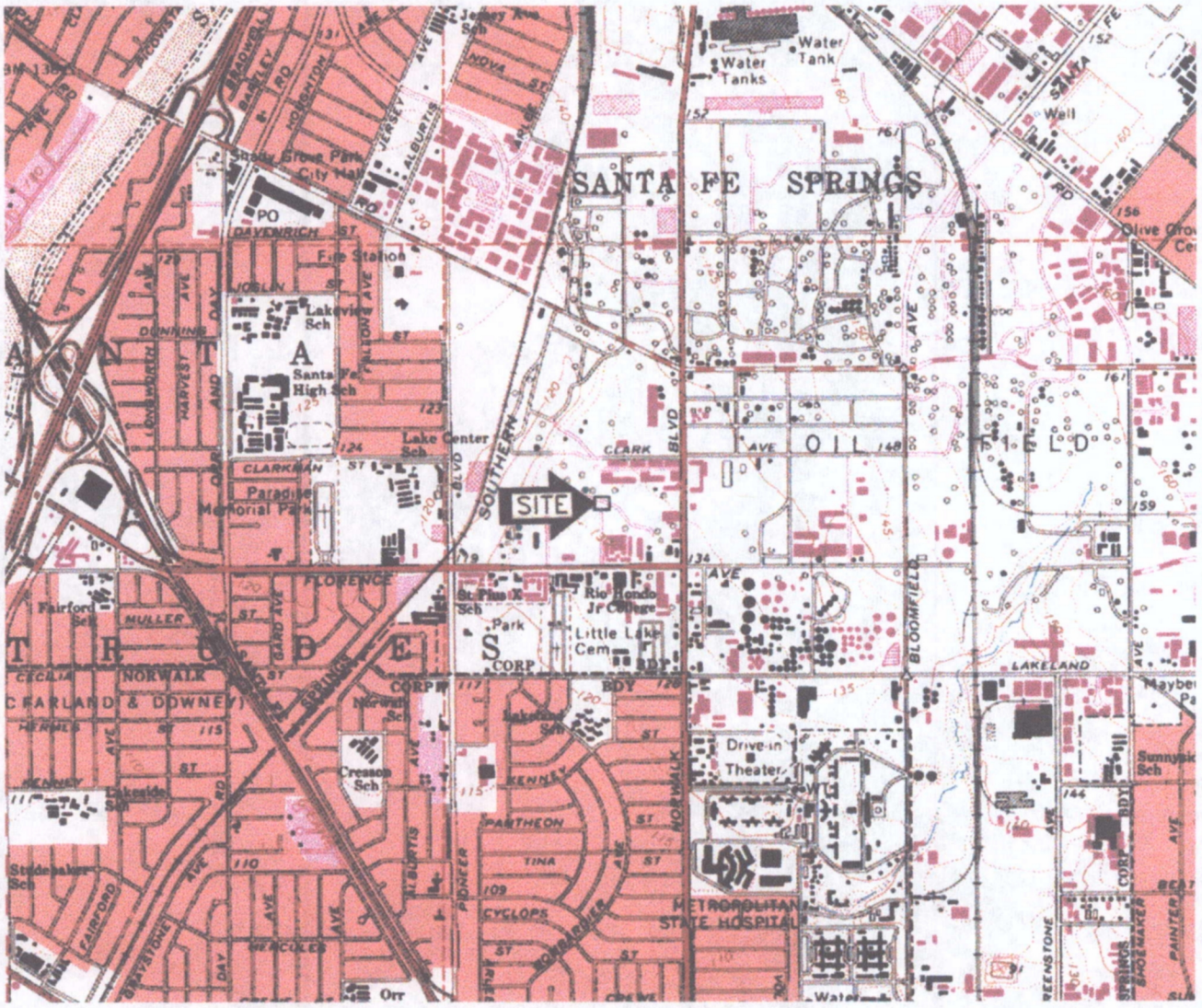
Very truly yours,
ATC ASSOCIATES INC.

JON R. LOVEGREEN, Certified Engineering Geologist No. EG 1164
Director, Technical Operations

REGISTERED GEOLOGIST
JON R. LOVEGREEN
CERTIFIED
ENGINEERING
GEOLOGIST
NO. EG1164
STATE OF CALIFORNIA

enclosures: Figures 1 through 3
Attachment 1 – Parcel Map
Attachment 2 – Backup Documentation for Figure 3
Attachment 3 – No Further Action Letters

cc: Mr. Greg Chila, SFS Norwalk, LLC, w/enc.
Ms. Christina Castellana, Weston Solutions, Inc., w/enc.
Mr. F. E. (Buddy) Hand, Jr., Exxon/Mobil Environmental Remediation, w/enc.



NORTH

0 ½ 1

SCALE, MILES

NOTE

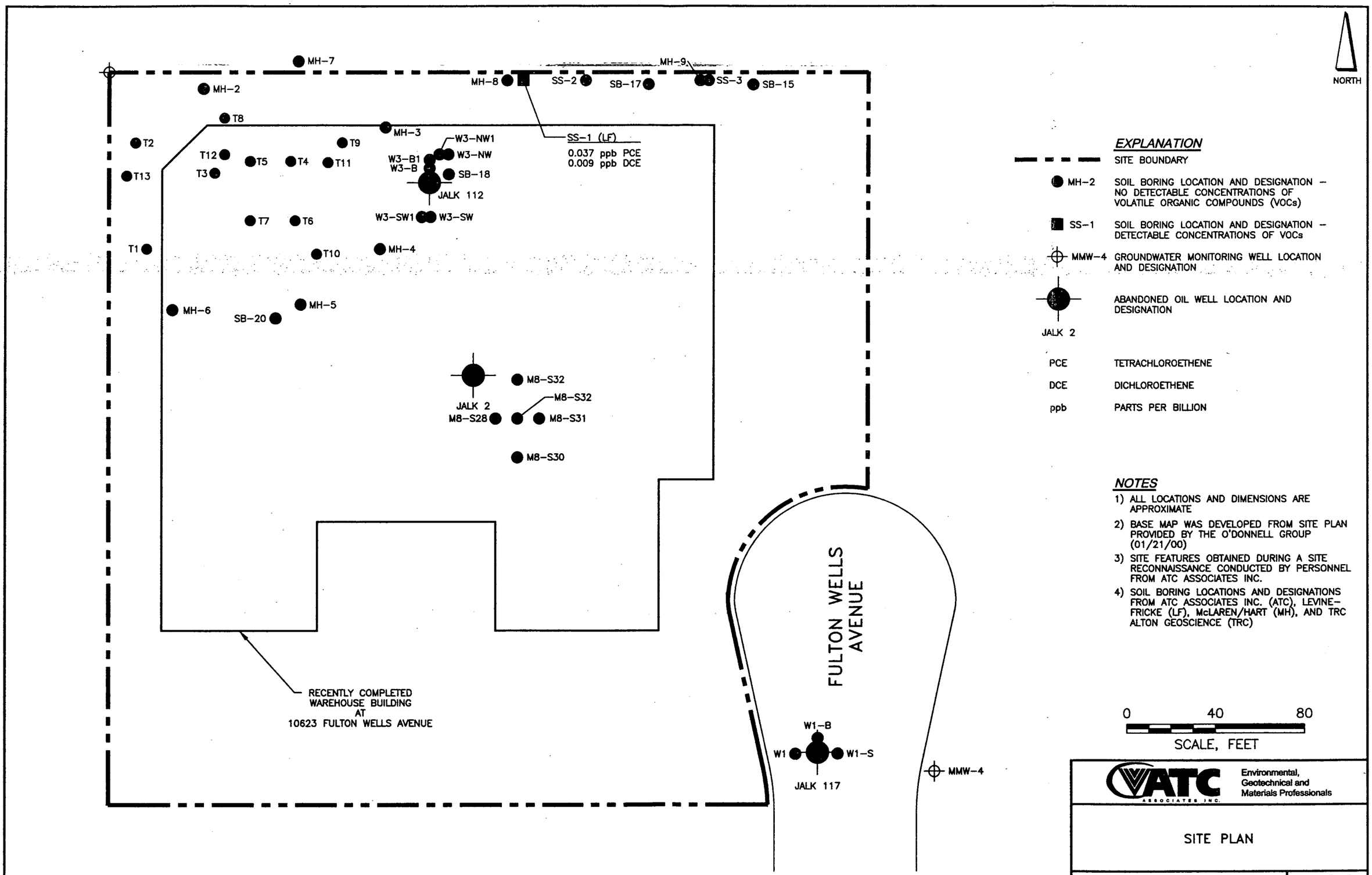
BASE MAP IS TAKEN FROM USGS WHITTIER QUADRANGLE, CALIFORNIA, LOS ANGELES COUNTY, 7.5–MINUTE SERIES (TOPOGRAPHIC), 1965, PHOTOREVISED 1981

VATC ASSOCIATES INC.

Environmental, Geotechnical and Materials Professionals

SITE VICINITY MAP

PROJECT NUMBER 42.11378.4206–6 | FIGURE 1



NOTES

1) ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
2) BASE MAP WAS DEVELOPED FROM SITE PLAN PROVIDED BY THE O'DONNELL GROUP (01/21/00)
3) SITE FEATURES OBTAINED DURING A SITE RECONNAISSANCE CONDUCTED BY PERSONNEL FROM ATC ASSOCIATES INC.
4) SOIL BORING LOCATIONS AND DESIGNATIONS FROM ATC ASSOCIATES INC. (ATC), LEVINE-FRICKE (LF), McLAREN/HART (MH), AND TRC ALTON GEOSCIENCE (TRC)

0 40 80
SCALE, FEET

ATC ASSOCIATES INC. Environmental, Geotechnical and Materials Professionals

SITE PLAN

PROJECT NUMBER 42.11378.4206-6 | FIGURE 3

PHOTO 1. NORTHWESTERLY VIEW DURING CONSTRUCTION OF THE RECENTLY COMPLETED WARE-HOUSE DISTRIBUTION FACILITY AT 10623 FULTON WELLS IN SANTA FE SPRINGS, CA.

ATC ASSOCIATES INC.
Environmental, Geotechnical and Materials Professionals

SITE PHOTOGRAPH

PROJECT NUMBER 42.11378.4206-6 | FIGURE 2

ATTACHMENT 1

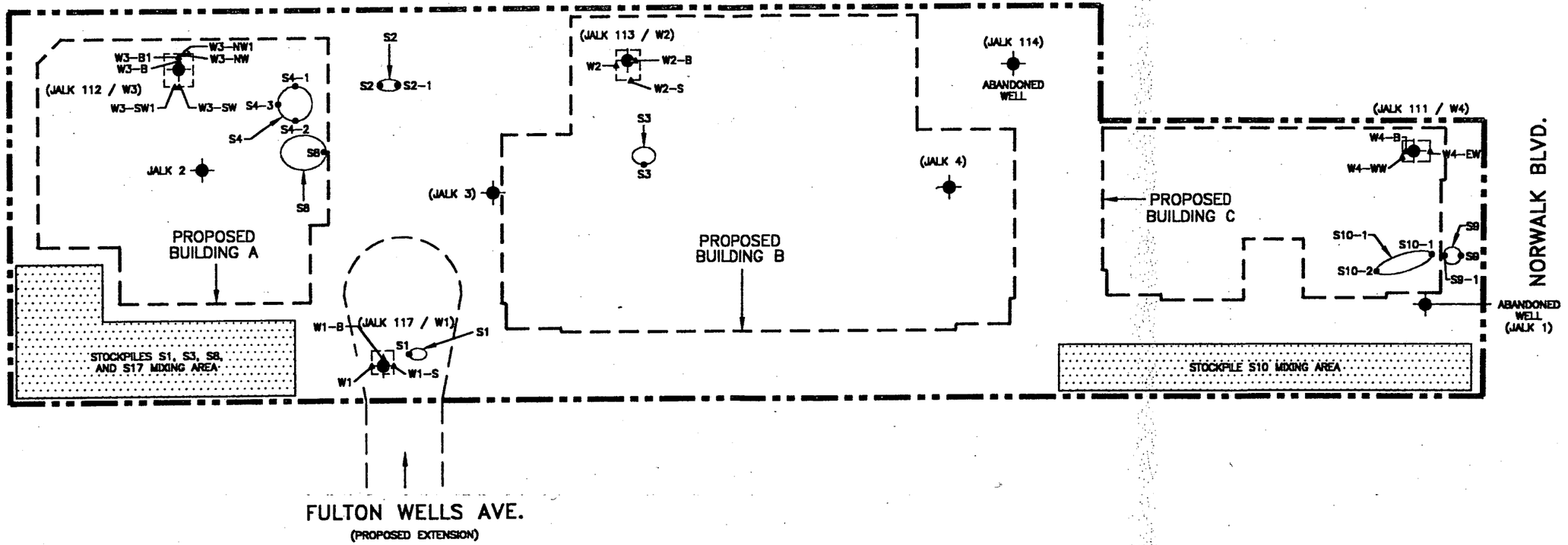
PARCEL MAP

PARTIALLY SCANNED
OVERSIZE ITEM(S)

See document #_2374157
for partially scanned image(s)

Sheet 1 to Sheet 2
(1 of 2 to 2 of 2)

For complete hardcopy version of the oversize document
contact the Region IX Superfund Records Center



EXPLANATION

- SITE BOUNDARY
- PROPOSED BUILDINGS
- JALK 112 / W3 — ABANDONED OIL WELL LOCATION NUMBER/ ATC EXCAVATION DESIGNATION
- ▲ W4-B — ABANDONED OIL WELL EXCAVATION SOIL SAMPLE LOCATION AND DESIGNATION
- ABANDONED OIL WELL EXCAVATION
- S9 — SOIL STOCKPILE LOCATION AND DESIGNATION
- • S8 — SOIL STOCKPILE SOIL SAMPLE LOCATION AND DESIGNATION
- STOCKPILE MIXING AREA

NOTES

1) ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
2) BUILDING LOCATION AND SITE BOUNDARY OBTAINED FROM DRAWING BY HILL PINCKERT ARCHITECTS, INC., DATED 21 JANUARY 2000
3) OIL WELL LOCATIONS OBTAINED FROM DRAWING BY HILL PINCKERT ARCHITECTS INC., DATED 12 SEPTEMBER 1999

ATC ASSOCIATES INC.
ENVIRONMENTAL, GEOTECHNICAL AND MATERIALS PROFESSIONALS

OIL WELL EXCAVATIONS AND SOIL SAMPLE LOCATIONS

PROJECT NUMBER 42.25527.0001 | FIGURE 4

ATTACHMENT 2

BACKUP DOCUMENTATION FOR FIGURE 3

6/20/02
N.O.

SITE CLOSURE REPORT AND RISK ASSESSMENT

November 28, 2000

Mobil Jalk Fee Property
10607 Norwalk Boulevard
Santa Fe Springs, California

TRC Alton Geoscience Project No. 23-0134

Prepared For:

EXXONMOBIL
1200 Timberloch Place
Room 308
The Woodlands, Texas 77380

By:

Jeff Hensel, RG, REA
Project Manager

REGISTERED GEOLOGIST
JEFFREY HENSEL
No. 5759
STATE OF CALIFORNIA

Todd Stanford,
Associate, Irvine Operations

TRC ALTON GEOSCIENCE
21 Technology Drive
Irvine, California 92618

TRC
Customer-Focused Solutions

TABLE 2
VOC Results of TRC Confirmation Soil Samples
Jalk Fee Property / Santa Fe Springs, California
October and November 2000

SAMPLE NUMBER	DEPTH (fbg) [1]	VOCs [2] (mg/kg)			
		c-1,2-DCE [3]	PCE [4]	TCE [5]	Other VOCs [6]
EXCAVATION AREA M-1					
JF-M1-S37-EW-8	8.0	<0.001	<0.001	<0.001	0.00572
JF-M1-S38-B-14	14	<0.001	0.059	<0.001	6.214
JF-M1-S39-SW-8	8.0	<0.001	0.00099	<0.001	0.0076
JF-M1-S40-WW-8	8.0	<0.001	0.00065	<0.001	0.0091
EXCAVATION AREA M-2					
JF-M2-S16-B-10	10	<0.001	<0.001	<0.001	0.00638
EXCAVATION AREA M-3					
JF-M3-S29-B-16	*16*	*<0.001*	*<0.001*	*<0.001*	*145.56*
JF-M3-S33-EW-10	10	<0.001	<0.001	<0.001	0.03347
JF-M3-S34-WW-14	14	<0.001	<0.001	<0.001	0.01271
JF-M3-S35-NW-13	13	<0.001	0.27	<0.001	0.0155
JF-M3-S36-SW-13	13	<0.001	<0.001	<0.001	0.00447
EXCAVATION AREA M-7					
JF-M7-S22-EW-8	8.0	<0.001	0.0031	<0.001	0.0132
JF-M7-S23-SW-8	8.0	<0.001	0.046	<0.001	0.0233
JF-M7-S24-B-13	13	<0.001	0.0054	<0.001	0.08384
JF-M7-S25-WW-8	8.0	<0.001	0.0049	<0.001	0.032
JF-M7-S26-NW-8	8.0	<0.001	0.0041	<0.001	0.00499
EXCAVATION AREA M-8					
JF-M8-S27-B-13	13	<0.001	<0.001	<0.001	ND
JF-M8-S28-WW-10	10	<0.001	<0.001	<0.001	0.2
JF-M8-S30-SW-10	10	<0.001	<0.001	<0.001	0.0094
JF-M8-S31-EW-10	10	<0.001	<0.001	<0.001	0.00708
JF-M8-S32-NW-10	10	<0.001	<0.001	<0.001	0.1501
EXCAVATION AREA M-9					
JF-M9-S17-WW-5	5.0	<0.001	<0.001	<0.001	0.013
JF-M9-S18-NW-5	5.0	<0.001	<0.001	<0.001	0.011
JF-M9-S19-B-7	*7.0*	*<0.001*	*<0.001*	*<0.001*	*5.207*
JF-M9-S20-SW-5	5.0	<0.001	<0.001	<0.001	0.0162
JF-M9-S21-EW-5	5.0	<0.001	<0.001	<0.001	0.00848
EXCAVATION AREA SB-49					
JF-SB49-S1-SW-5	5.0	0.023	0.0073	<0.001	0.05177
JF-SB49-S2-NW-5	5.0	0.0012	0.0055	<0.001	0.0112
JF-SB49-S3-B-6	6.0	0.00061	0.0099	<0.001	0.0133
JF-SB49-S4-B-7	*7.0*	*8.8*	*31*	*5.9*	*104.2*
JF-SB49-S4B-B-13	13	0.02	1.1	0.0024	ND
JF-SB49-S5-SW-5	*5.0*	*1.4*	*61*	*0.71*	*0.73*
JF-SB49-S5B-SW-10	10	2.0	3.0	0.73	35.74
JF-SB49-S6-NW-5	5.0	0.025	0.4	0.0053	0.03535
JF-SB49-S7-B-6	*6.0*	*<1.0*	*1,600*	*<1.0*	*4.9*
JF-SB49-S7B-B-12	12	0.0065	9.8	0.0065	0.0152
JF-SB49-S8-SW-5	5.0	0.0014	3.2	0.0016	0.0153
JF-SB49-S9-NW-5	*5.0*	*0.033*	*250*	*0.089*	*0.53786*
JF-SB49-S9B-NW-6	6.0	<0.001	0.14	<0.001	0.0071
JF-SB49-S10-B-7	*7.0*	*0.0014*	*2,000*	*0.14*	*0.7609*
JF-SB49-S10B-B-8	8.0	<0.001	2.5	0.0089	0.0229
JF-SB49-S11-SW-5	5.0	<0.001	1,300	0.01	0.52733
JF-SB49-S12-NW-5	*5.0*	*0.00055*	*440*	*0.13*	*0.34907*
JF-SB49-S12B-NW-6	6.0	<0.001	1.7	<0.001	0.00883
JF-SB49-S13-B-6	6.0	<0.001	1.4	<0.001	0.17185
JF-SB49-S14-SW-5	5.0	<0.001	1.1	<0.001	0.23029
JF-SB49-S15-NW-5	5.0	<0.001	0.15	<0.001	0.0815

[1] fbg - feet below grade.

[2] VOCs - volatile organic compounds.

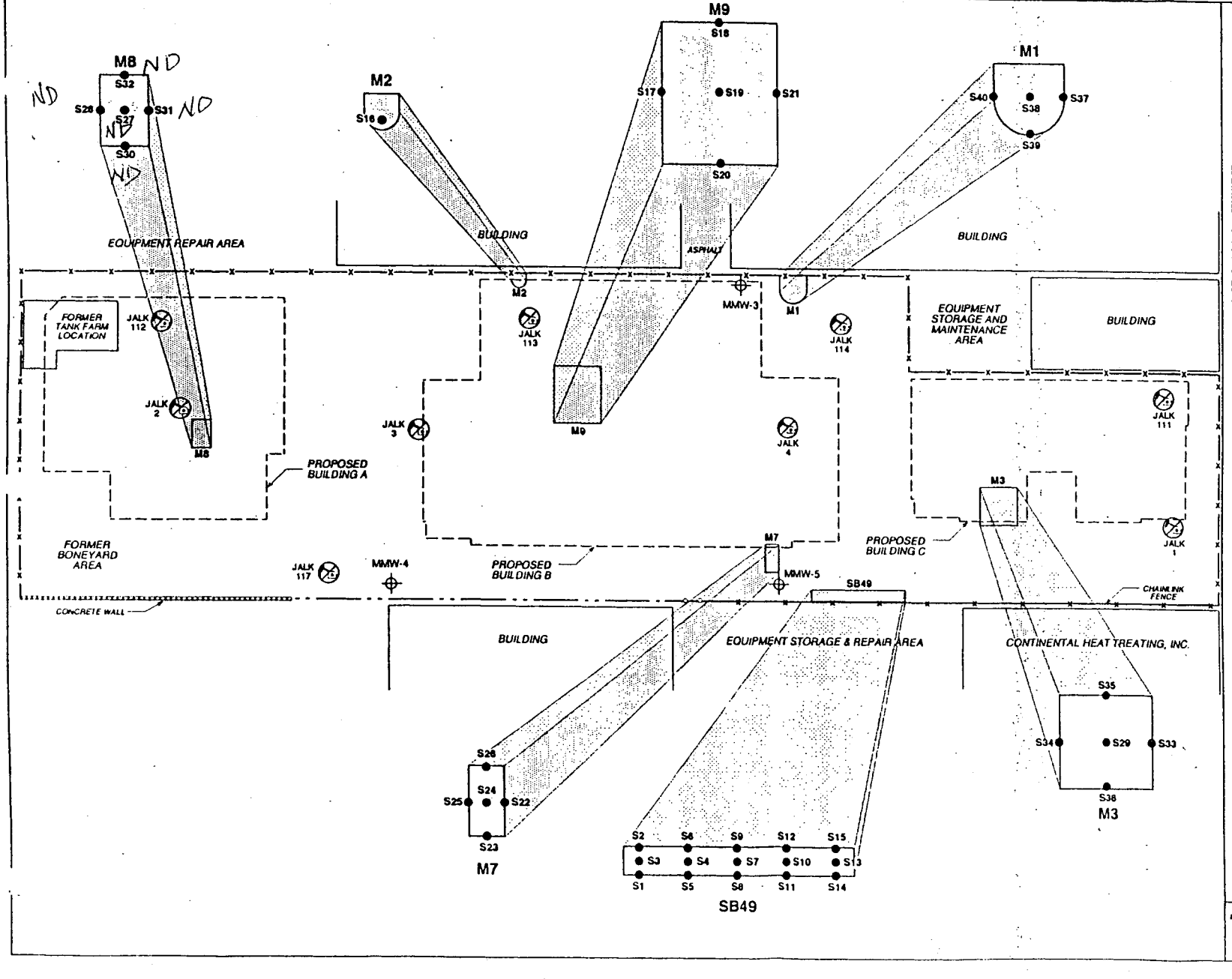
[3] c-1,2-DCE - cis-1,2-dichloroethene.

[4] PCE - tetrachloroethene.

[5] TCE - trichloroethene.

[6] Total remaining VOCs including acetone and methylene chloride which are possible laboratory contaminants.

Note: Results in blue font italics were excavated.



N

LEGEND

- M9 — Excavation
- S40 — Confirmation Soil Sample
- MMW-5 — Monitoring Well
- JALK 117 — Abandoned Oil Well
- Gate

SITE SCALE (FEET)

0 100 200

ENLARGEMENTS SCALE (FEET)

0 40

NOTES:

Building location and site boundary obtained from drawing by Hill Pinckert Architects, Inc., dated 21 January 2000.
Oil well locations obtained from drawing by Hill Pinckert Architects, Inc., dated 12 September 1999.

Source: Modified from maps created by McLaren-Hart, 1996, and ATC Associates, 2000.

SITE PLOT PLAN and TRC CONFIRMATION SOIL SAMPLE LOCATION MAP

Mobil Jalk Fee Property
10607 Norwalk Boulevard
Santa Fe Springs, California

TRC Alton Geoscience

FIGURE 2

17 November 2000

Prepared for:

Hathaway Oil Company
P.O. Box 3404
Santa Fe Springs, California 90670

by:

ATC Associates Inc.
17321 Irvine Blvd., 2nd Floor
Tustin, California 92780
(714) 734-0303

SUMMARY REPORT OF SOIL REMEDIATION AT HATHAWAY/JALK FEE LEASE PROPERTY LOCATED AT 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA

NABHAN ODEH, R.E.A.
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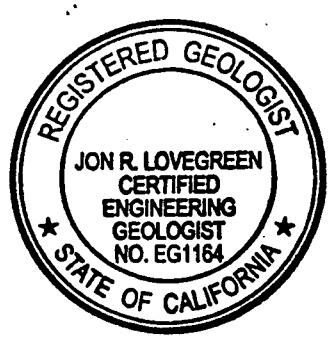
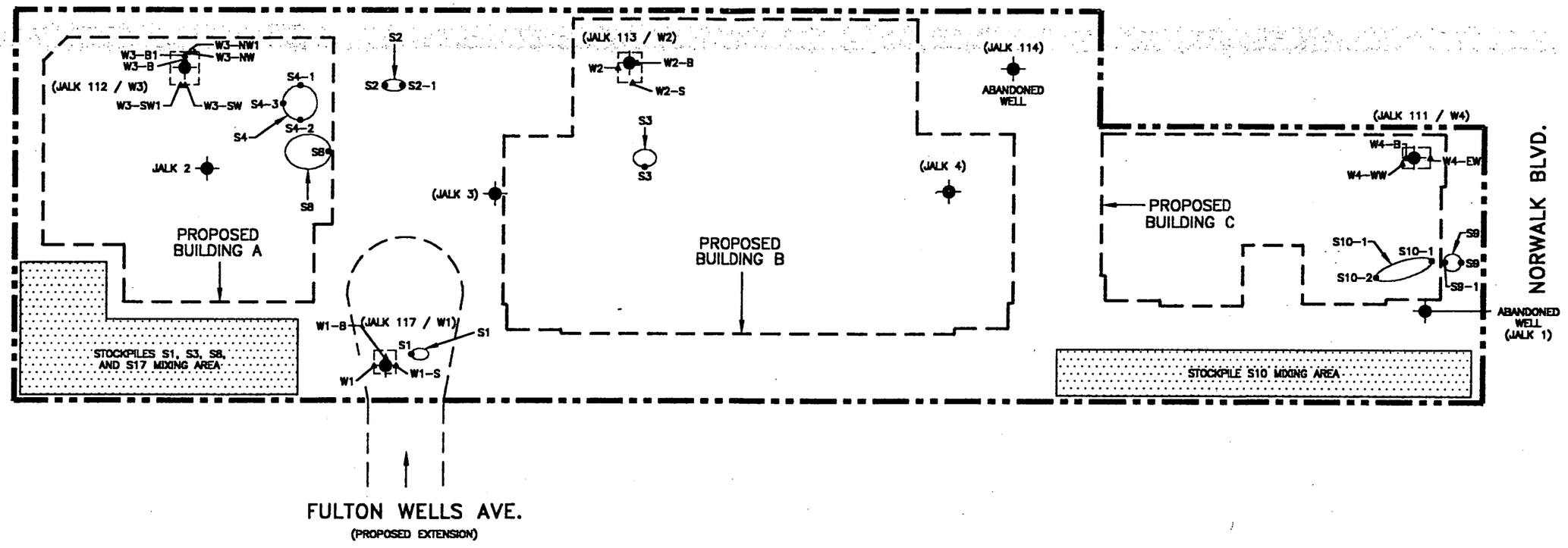
Project No. 42.25527.0001





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SCALE, FEET

EXPLANATION

- SITE BOUNDARY
- PROPOSED BUILDINGS
- JALK 112 / W3 — ABANDONED OIL WELL LOCATION NUMBER/ ATC EXCAVATION DESIGNATION
- ▲ W4-B — ABANDONED OIL WELL EXCAVATION SOIL SAMPLE LOCATION AND DESIGNATION
- ABANDONED OIL WELL EXCAVATION
- S9 — SOIL STOCKPILE LOCATION AND DESIGNATION
- • S8 — SOIL STOCKPILE SOIL SAMPLE LOCATION AND DESIGNATION
- STOCKPILE MIXING AREA

NOTES

1) ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
2) BUILDING LOCATION AND SITE BOUNDARY OBTAINED FROM DRAWING BY HILL PINCKERT ARCHITECTS, INC., DATED 21 JANUARY 2000
3) OIL WELL LOCATIONS OBTAINED FROM DRAWING BY HILL PINCKERT ARCHITECTS INC., DATED 12 SEPTEMBER 1999

VATC ASSOCIATES INC.
ENVIRONMENTAL, GEOTECHNICAL AND MATERIALS PROFESSIONALS

OIL WELL EXCAVATIONS AND SOIL SAMPLE LOCATIONS

PROJECT NUMBER 42.25527.0001 | FIGURE 4

TABLE 3. OIL WELLS EXCAVATION

Sample No	Location/Owner	Depth (ft)	C6-C12	C13-C22	>C23	VOCs	Semi-VOCs
W1-B	JALK 117 (W1)/Hathaway	10	ND	ND	ND	ND	---
W1 (west side)	JALK 117 (W1)/Hathaway	8	ND	ND	ND	---	---
W1-S (east side)	JALK 117 (W1)/Hathaway	8	ND	ND	ND	ND	---
W2-B	JALK 113 (W2)/Hathaway	10	ND	**78**	**180**	ND	---
W2-S (south side)	JALK 113 (W2)/Hathaway	8	ND	ND	ND	ND	---
W2 (west side)	JALK 113 (W2)/Hathaway	8	ND	ND	ND	---	---
W3-B	JALK 112 (W3)/Hathaway	11	ND	ND	ND	ND	---
W3-SW	JALK 112 (W3)/Hathaway	8	ND	ND	ND	ND	---
W3-NW	JALK 112 (W3)/Hathaway	7	ND	ND	ND	ND	---
W3-B1	JALK 112 (W3)/Hathaway	11	---	---	---	---	ND
W3-NW1	JALK 112 (W3)/Hathaway	8	---	---	---	---	ND
W3-SW1	JALK 112 (W3)/Hathaway	7	---	---	---	---	ND
W4-B	JALK 111 (W4)/Hathaway	10	ND	ND	ND	ND	---
W4-EW	JALK 111 (W4)/Hathaway	8	ND	ND	ND	ND	---
W4-WW	JALK 111 (W4)/Hathaway	7	**15**	ND	ND	ND	---

ND = not detected above the laboratory detection limits
--- = not analyzed
Concentrations are in milligrams per kilograms (mg/kg)
C6-C12, C13-C22, >C23, etc. are the total petroleum hydrocarbon concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8015m-cc
VOC's = Volatile organic compounds' concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8260B.
Semi-VOC's = Volatile organic compounds' concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8270.

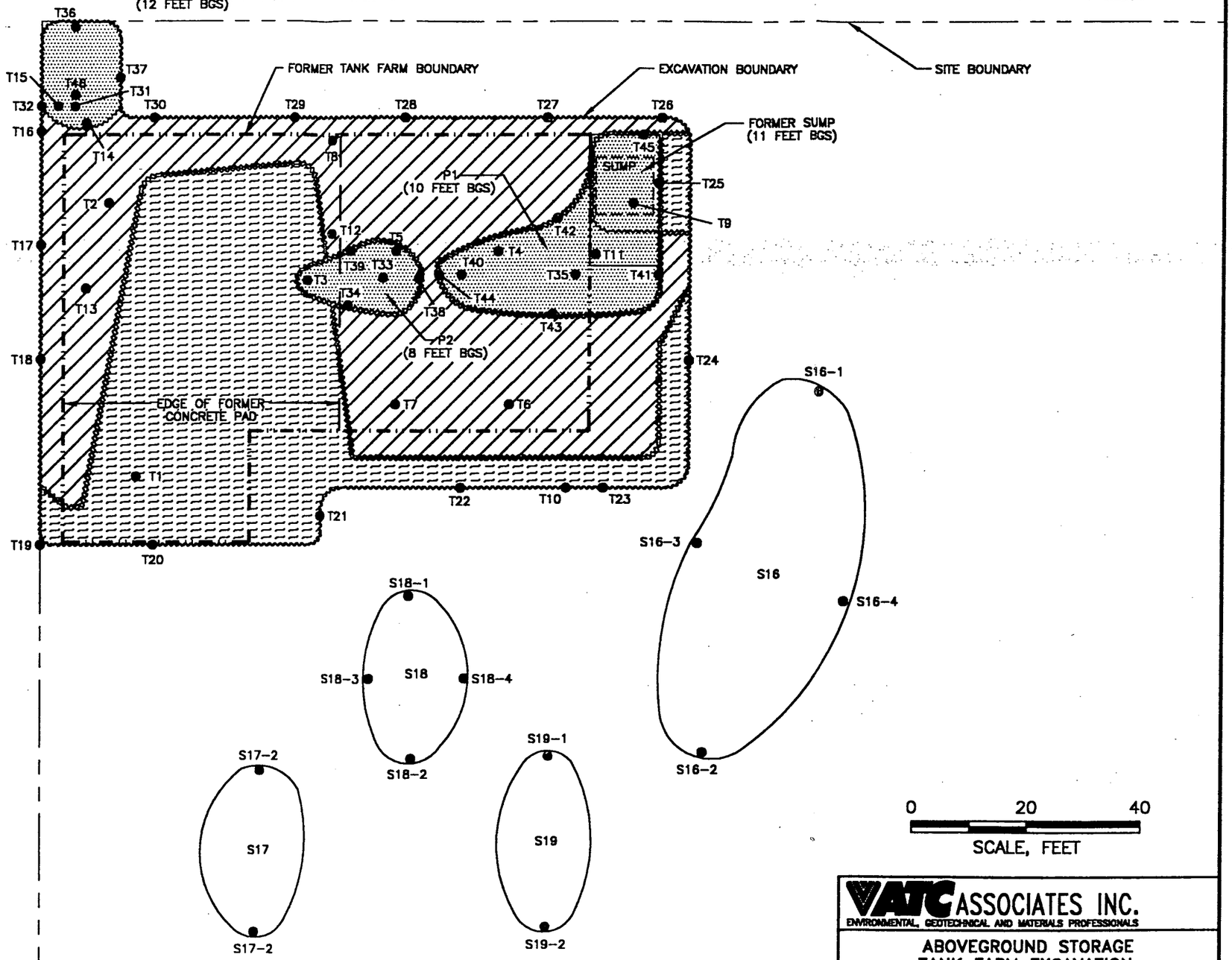
NORTH

EXPLANATION

- ● T22 — SAMPLE LOCATION AND DESIGNATION (HATHAWAY)
- ● T14 — SAMPLE LOCATION AND DESIGNATION (MOBIL)
- P1 (10 FEET BGS) — EXCAVATION DESIGNATION AND DEPTH (IN PARENTHESES) IN FEET BGS
- S16 — STOCKPILE
- EXCAVATION BOUNDARIES
- FORMER TANK FARM CONTAINMENT
- FORMER SUMP
- 3 TO 4 FOOT EXCAVATION DEPTH
- 5 TO 6 FOOT EXCAVATION DEPTH
- 8 TO 12 FOOT EXCAVATION DEPTH

NOTES

1) ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
2) BASE MAP WAS DEVELOPED DURING A SITE RECONNAISSANCE CONDUCTED BY PERSONNEL FROM ATC ASSOCIATES INC.



ATC ASSOCIATES INC.
ENVIRONMENTAL, GEOTECHNICAL AND MATERIALS PROFESSIONALS

ABOVEGROUND STORAGE TANK FARM EXCAVATION, STOCKPILES, AND SOIL SAMPLE LOCATIONS

PROJECT NUMBER 42.25527.0001 | FIGURE 5B

TABLE 4. TANK FARM EXCAVATION

Sample No.	Location/ Owner	Depth (ft)	C6-C12	C13-C22	>C23	VOCs	Metals
T1	TF-Tanks I, J & K/ Hathaway	5.5	ND	ND	ND	ND	93 Barium 3 Cadmium 25 Chromium 14 Cobalt 19 Copper 12 Lead 4 Molybdenum 16 Nickel 5 Thallium 30 Vanadium 50 Zinc
T2	TF-Tanks G & H/ Hathaway	5.5	ND	ND	ND	ND	120 Barium 3 Cadmium 21 Chromium 14 Cobalt 20 Copper 3 Lead 4 Molybdenum 17 Nickel 5 Thallium 31 Vanadium 53 Zinc
T3	TF-Tanks E & F/ Hathaway	5.5	ND	120	ND	ND	---
T4	TF-Tank A clean-out/Hathaway	5.5	14	340	140	.006 sec-butylbenzene .023 naphthalene	---
T5	TF-Tank B clean-out /Hathaway	5.5	14	1,100	260	.016 sec-butylbenzen .046 naphthalene	---
T6	TF-Tank C clean-out/ Hathaway	5.5	23	730	290	.15 ethylbenzene .005 o-xylene .026 iso-propylbenzene .041 n-propylbenzene .007 1,3,5-trimethylbenzene .008 1,2,4-trimethylbenzene .024 sec-butylbenzene .007 p-isopropylbenzene .012 n-butylbenzene .013 naphthalene	---
T7	TF-Tank D clean-out/ Hathaway	5.5	ND	300	160	ND	---

Sample No.	Location/ Owner	Depth (ft)	C6-C12	C13-C22	>C23	VOCs	Metals
T8	TF-runoff sump/ Hathaway	5.5	ND	190	ND	.011 1,1,2,2-tetrachloroethane .006 sec-butylbenzene .021 naphthalene	---
T9	TF-oil sump/ Hathaway	11	ND	150	40	ND	---
T10	TF-Tank L/ Hathaway	5.5	ND	ND	ND	ND	---
T11	TF-southwest of oil sump/ Hathaway	5.5	ND	ND	ND	ND	---
T12	TF-northeast of Tank F/ Hthaway	5.5	ND	520	340	.053 benzene .190 toluene .030 ethylbenzene .096 m&p-xylene .045 o-xylene .470 iso-propylbenzene .820 n-propylbenzene .009 1,3,5-trimethylbenzene .091 tert-butylbenzene .021 1,2,4-trimethylbenzene .570 sec-butylbenzene .059 n-butylbenzene 3 naphthalene	---
T13	TF-south of Tank H/ Hathaway	5.5	ND	ND	ND	.007 benzene .009 toluene .015 naphthalene	---
T14	TF- northwest corner-bottom/Mobil	6	ND	ND	ND	---	---
T15	TF- northwest corner-wall/Mobil	5.5	130	85,00	2,100	---	---
T16	TF-west wall/Mobil	5.5	ND	ND	ND	---	---
T17	TF-west wall/ Hathaway	5.5	ND	ND	ND	---	---
T18	TF-west wall/ Hathaway	5.5	ND	ND	ND	---	---
T19	TF-southwest corner/ Hathaway	4	ND	ND	ND	---	---
T20	TF-south wall/ Hathaway	4	ND	ND	ND	---	---

Sample No.	Location/ Owner	Depth (ft)	C6-C12	C13-C22	>C23	VOCs	Metals
T21	TF-south wall/ Hathaway	4	ND	ND	ND	---	---
T22	TF-south wall/ Hathaway	4	ND	ND	ND	---	---
T23	TF-south wall/ Hathaway	4	ND	ND	ND	---	---
T24	TF-east wall/ Hathaway	4	ND	ND	ND	---	---
T25	TF-east wall/ Hathaway	6	ND	ND	ND	---	---
T26	TF-north wall/ Hathaway	4	ND	ND	ND	---	---
T27	TF-north wall/ Hathaway	5	ND	ND	ND	---	---
T28	TF-north wall/ Hathaway	5	ND	ND	ND	---	---
T29	TF-north wall/ Hathaway	4	ND	ND	ND	---	---
T30	TF-north wall/ Hathaway	4	ND	ND	ND	---	---
T31	TF/P3-bottom/Mobil	8	**270**	**5,200**	**2,500**	---	---
T32	TF/P3-west wall/Mobil	7	ND	ND	ND	---	---
T33	TF/P2-bottom/ Hathaway	8	ND	ND	ND	---	---
T34	TF/P2-south / Hathaway wall	7	ND	ND	ND	---	---
T35	TF/P1-bottom/ Hathaway	10	ND	ND	ND	---	---
T36	TF/P3-north wall/Mobil	6	**23**	**680**	**820**	---	---
T37	TF/P3-east wall/ Hathaway	6	ND	ND	ND	---	---
T38	TF/P2-east wall/ Hathaway	6	ND	ND	ND	---	---
T39	TF/P2-north wall/ Hathaway	6	ND	ND	ND	---	---
T40	TF/P1-bottom/ Hathaway	10	ND	ND	ND	---	---
T41	TF/P1-east wall/ Hathaway	8	ND	ND	ND	---	---
T42	TF/P1-north wall/ Hathaway	7	ND	ND	ND	---	---
T43	TF/P1-south wall/ Hathaway	8	ND	ND	ND	---	---
T44	TF/P1-west wall/ Hathaway	7	ND	ND	ND	---	---
T45	Oil sump-north wall/ Hathaway	8	ND	ND	ND	---	---
T46	TF/P3-bottom/Mobil	12	ND	ND	ND	---	---

Sample No.	Location/ Owner	Depth (ft)	C6-C12	C13-C22	>C23	VOCs	Metals

T1 = soil sample
TF = former tank farm excavation
P1 = post sampling excavation
ND = not detected above the laboratory detection limits
--- = not analyzed
Concentrations are in milligrams per kilograms (mg/kg) = parts per million (ppm)
C6-C12, C13-C22, >C23, etc. are the total petroleum hydrocarbon concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8015m-cc
Semi-VOCs = Semi-volatile organic compounds' concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8270
PCBs = Polychlorinated biphenyls' concentrations based on analysis conducted in general with US EPA Method 8080.
CAM 17 metals concentrations based on analysis conducted in general with US EPA Method No. 6000/7000

TABLE 5. STOCKPILE SOIL

Sample No.	Location/ Owner	C6-C12	C13-C22	>C30	Semi-VOCs	BTEX	PCBs	Metals
S1	JALK 117 W1/Hathaway	ND	350	480	ND	---	ND	---
S2	JALK 112 W3/Hathaway	1,400	35,000	12,000	17 (2-methylnaph-thalene) 8.80 (fluorene) 8.40 (phenan-threne) 2.30 (pyrene) 2 (chrysene)	---	ND	---
S2-1	JALK 112 W3/Hathaway	---	---	---	---	ND	---	---
S3	JALK 113 W2/Hathaway	ND	ND	ND	---	---	---	---
S4-1	JALK 112 W3/Hathaway	ND	110	1,200	---	---	---	---
S4-2	JALK 112 W3/Hathaway	ND	180	2,600	ND	---	ND	---
S4-3	JALK 112 W3/Hathaway	—	—	—	---	ND	---	320 (barium) 4 (cadmium) 71 (chrom.) 12 (cobalt) 45 (copper) 110 (lead) 4 (molybden.) 30 (nickel) 20 (vanad.) 260 (zinc)
S5	M3/P15/Mobil	46	2,300	2,100	---	---	---	---
S6-1	M1/P10/Mobil	150	370	270	---	---	---	---
S6-2	M1/P10/Mobil	1,900	5,600	2,600	---	---	---	---
S7-1	M2/P10/Mobil	74	760	590	---	---	---	---
S7-2	M2/P10/Mobil	16	1,300	17,000	---	---	---	---
S8	JALK 112 W3/Hathaway	12	480	580	---	---	---	---
S9	JALK 111 W4/Hathaway	ND	1,600	44,000	---	---	---	---
S9-1	JALK 111 W4/Hathaway	---	—	—	---	ND	---	250 (barium) 5 (cadmium) 21 (chrom.) 13 (cobalt) 71 (copper) 210 (lead) 5 (molybden.) 30 (nickel) 23 (vanad.) 340 (zinc)

Sample No.	Location/ Owner	C6-C12	C13-C22	>C30	Semi-VOCs	BTEX	PCBs	Metals
S10-1	JALK 111 W4/Hathaway	ND	230	380	ND	---	ND	---
S10-2	JALK 111 W4/Hathaway	67	820	590	0.690 (2-methylnaph-thalene) 0.610 (fluorene) 0.90 (phenan-threne)	---	ND	---
S11	M5/P34/Mobil	5,000	12,000	6,800	---	---	---	---
S12	M6/P34/Mobil	1,400	13,000	10,000	---	---	---	---
S13	M4/P52/Mobil	160	840	630	---	---	---	---
S14	M7/P55/Mobil	410	4,500	1,100	---	---	---	---
S15	M8/Boring A2 Mobil	110	1,400	1,400	---	---	---	---
S16-1	Tank Farm Hathaway	6,000	9,700	3,400	---	---	---	---
S16-2	Tank Farm Hathaway	ND	280	280	---	---	---	---
S16-3	Tank Farm Hathaway	ND	69	110	---	---	---	---
S16-4	Tank Farm Hathaway	---	---	---	---	ND	---	---
S17-1	Tank Farm Hathaway	ND	19	28	---	---	---	---
S17-2	Tank Farm Hathaway	ND	ND	ND	---	---	---	---
S18-1	Tank Farm Hathaway	140	1,500	1,500	---	---	---	---
S18-2	Tank Farm Hathaway	120	610	690	---	---	---	---
S18-3	Tank Farm Hathaway	9,500	15,000	8,000	---	---	---	---
S18-4	Tank Farm Hathaway	---	---	---	---	ND	---	---
S19-1	Tank Farm Mobil	5,000	17,000	11,000	---	---	---	---
S19-2	Tank Farm Mobil	97	2,000	1,600	---	---	---	---
Com-posit	(Samples S4-3, S9-1, T1, T2)	---	---	---	---	---	---	ND (Lead)

Sample No.	Location/ Owner	C6-C12	C13-C22	>C30	Semi-VOCs	BTEX	PCBs	Metals

ND = not detected above the laboratory detection limits
--- = not analyzed
Concentrations are in milligrams per kilograms (mg/kg) = parts per million (ppm)
C6-C12, C13-C22, >C23, etc. are the total petroleum hydrocarbon concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8015m-cc
Semi-VOCs = Semi-volatile organic compounds' concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8270
BTEX = benzene, toluene, ethylbenzene, xylene concentrations based on analysis conducted in general accordance with U.S. EPA Method No. 8020
PCBs = Polychlorinated biphenyls' concentrations based on analysis conducted in general with US EPA Method No. 8080.
CAM 17 metals concentrations based on analysis conducted in general with US EPA Method No. 6000/7000
S = soil stockpile, M1 = excavation, P10 = piping trench

6/20/02
N.O.

Prepared by:

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September 20, 1996

ADDITIONAL SOIL SAMPLING AT MOBIL JALK FEE PROPERTY 10607 NORWALK BOULEVARD SANTA FE SPRINGS, CALIFORNIA (03.0601414.001.001)

McLaren Hart®
ENVIRONMENTAL ENGINEERING CORPORATION

Table 2

Soil Sample Analytical Results for Oil Production Well and Tank Battery (Task 1)

Mobil Jalk Fee Property, Santa Fe Springs, California

Soil Boring Identification	Depth (feet)	Date Sampled	EPA Method 8020 (parts per billion, ppb)						EPA Method 8015 Modified (parts per million, ppm)				EPA Method 8240 (ppb)	EPA Method 8010 (ppb)
			Benzene	Toluene	Ethylbenzene	1,2-Xylene	1,3-Xylene	1,4-Xylene	Gasoline Range (C4-C12)	Diesel Range (C12-C22)	Motor Oil Range (C22-C32)	Heavy Hydrocarbon Range (C32-C40)	VOCs	HVOCS
MH-2	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-2	10	12/21/95	--	--	--	--	--	--	<10	<10	13	<10	BRL	--
MH-4	5	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
MH-4	10	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
MH-4	20	12/21/95	--	--	--	--	--	--	--	--	--	--	BRL	--
MH-4	30	12/21/95	--	--	--	--	--	--	--	--	--	--	BRL	--
MH-4	40	12/21/95	--	--	--	--	--	--	--	--	--	--	BRL	--
MH-5	5	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
MH-5	10	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
MH-6	5	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
MH-6	10	12/21/95	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	--	--
Screening Criteria			10[1]	1,500[1]	7,000[1]	17,500[1]	17,500[1]	17,500[1]	100	1,000	10,000		Various	NC

-- - Not Analyzed
BRL - Below Reporting Limit
NC - No Criteria

[1] - Cleanup criteria equals the maximum contaminant level (MCL) times 10

Created by: M. Williams
Reviewed by: E. Ferguson

G:\M\MOBIL\060141\TABLE2.XLS

Table 4
Soil Sample Analytical Results for Northwest Perimeter and Northeast Perimeter (Task 3)

Mobil Jalk Fee Property, Santa Fe Springs, California

Soil Boring Identification	Depth (feet)	Date Sampled	EPA Method 8020 (parts per billion, ppb)						EPA Method 8015 Modified (parts per million, ppm)				EPA Method 8240 (ppb)	EPA Method 8010 (ppb)
			Benzene	Toluene	Ethylbenzene	1,2-Xylene	1,3-Xylene	1,4-Xylene	Gasoline Range (C4-C12)	Diesel Range (C12-C22)	Motor Oil Range (C22-C32)	Heavy Hydrocarbon Range (C32-C40)	VOCs	HVOCS
MH-7	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-7	10	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-8	1	12/21/95	--	--	--	--	--	--	<500	<500	1600	<500	BRL	--
MH-8	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-9	1	12/21/95	--	--	--	--	--	--	<10	<10	85	<10	BRL	--
MH-9	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-10	1	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-10	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-10	10	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-11	1	12/21/95	--	--	--	--	--	--	<500	<500	820	<500	BRL	--
MH-11	5	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
MH-11	10	12/21/95	--	--	--	--	--	--	<10	<10	<10	<10	BRL	--
Screening Criteria			10[1]	1,500[1]	7,000[1]	17,500[1]	17,500[1]	17,500[1]	100	1,000	10,000		Various	NC

-- - Not Analyzed
BRL - Below Reporting Limit
NC - No Criteria

[1] - Cleanup criteria equals the maximum contaminant level (MCL) times 10

Created by: M. Williams
Reviewed by: E. Ferguson

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FIGURE 5
SOIL SAMPLE ANAYTICAL RESULTS
JALK FEE SITE
TANK BATTERY AND NORTHWEST PERIMETER
10607 NORWALK BLVD.
SANTA FE SPRINGS, CALIFORNIA

OFF SITE EQUIPMENT REPAIR AREA

DRIVEWAY

ABOVE-GROUND STORAGE TANK FARM

MH-7 (12/21/95)
5' M-8015 <10
8240 BRL
10' M-8015 <10
8240 BRL

SS-1 (07/19/91)
4.5' M-8015 200 C20-C30
520 C10-C20
418.1 2000
8260 0.037 PCE
0.009 DCE

SS-2 (07/19/91)
3' M-8015 280 C20 C30
418.1 1100
8260 ND

SS-3 (07/19/91)
2.5' M-8015 3900 C20-C30
9500 C10-C20
418.1 15000
8260 ND

MH-2 (12/21/95)
5' M-8015 <10
8240 BRL
10' M-8015 13 C22-C32
8240 BRL

MH-8 (12/21/95)
5' M-8015 1600 C22-C32
8240 BRL
10' M-8015 <10
8240 BRL

NP-B2-5' (03/11/94)
418.1
<5

SB-17 (01/03/91)
5' M-8015 ND
418.1 ND
8260 ND
20' M-8015 ND
418.1 ND
8260 ND

SB-15 (01/03/91)
5' M-8015 ND
418.1 ND
8260 ND
10' 8020 0.066 X
0.008 EB
20' M-8015 ND
418.1 ND
8260 ND
25' 8020 ND

NP-B1-5' (03/11/94)
418.1
<5

MH-3 (12/21/95)
REFUSEL AT 2'

SB-18 (01/03/91)
5' M-8015 ND
418.1 ND
8020 ND
8260 ND
25' M-8015 ND
418.1 ND
8020 ND
8260 ND

QA/QC
25' M-8015 ND
418.1 ND
8020 ND
8260 ND

MH-9 (12/21/95)
5' M-8015 85 C22-C32
8240 BRL
10' M-8015 <10
8240 BRL

MH-6 (12/21/95)
5' M-8015 <10
8240 BRL
10' M-8015 <10
8240 BRL

MH-5 (12/21/95)
5' M-8015 <10
8240 BRL
10' M-8015 <10
8240 BRL

MH-4 (12/21/95)
5' M-8015 <10
8240 BRL
10' M-8015 <10
8240 BRL
20' 8240 BRL
30' 8240 BRL
40' 8240 BRL

SB-20 (01/08/91)
15' M-8015 ND
418.1 ND
8020 ND
55' M-8015 ND
418.1 ND
8020 ND

N

(1" = 25')

LEGEND

- ● ▲ LEVINE-FRICKE SOIL SAMPLE LOCATIONS
- ■ McLAREN/HART SOIL SAMPLE LOCATIONS
- ⊕ McLAREN/HART PROPOSED SOIL SAMPLE LOCATIONS
- PROPERTY FENCELINE BOUNDARY
- ND NOT DETECTED
- BRL BELOW REPORTING LIMITS

CONCENTRATIONS IN PARTS PER MILLION (ppm)

SOURCE: LEVINE-FRICKE, 199
JALK FEE PROPERTY

McLaren Hart

ATTACHMENT 3

NO FURTHER ACTION LETTERS

City of Santa Fe Springs

Headquarters Fire Station

11300 Greenstone Ave. • CA • 90670-4619 • (562) 944-9713 • Fax (562) 941-1817 • www.santafesprings.org

March 20, 2001

F.E. (Buddy) Hand, Jr.
ExxonMobil Environmental Remediation
601 Jefferson Street
Houston, TX 77002-7901

Dear Mr. Hand:

SUBJECT: FINAL AMENDMENT TO THE NO FURTHER ACTION DETERMINATION FOR JALK FEE PROPERTY LOCATED AT 10607 NORWALK BOULEVARD IN SANTA FE SPRINGS, CA 90607

This letter supercedes the letters titled "No Further Action Determination for Jalk Fee Property Located at 10607 Norwalk Blvd. in Santa Fe Springs, CA 90670" dated December 26, 2000 (NFA Letter) and "Amendment to No Further Action Determination for Jalk Fee Property Located at 10607 Norwalk Blvd. in Santa Fe Springs, CA 90670" dated December 28, 2000 (Amendment). The amended no further action (NFA) determination follows.

This letter confirms the completion of a site investigation and remediation action for the subject location. The Santa Fe Springs Fire Department (SFSFD) received the following reports:

- "Summary Report of Soil Remediation at Hathaway/Jalk Fee Lease Property Located at 10607 Norwalk Boulevard in Santa Fe Springs, California" (Hathaway Report) dated November 17, 2000 submitted by ATC Associates Inc. (ATC) on behalf of Hathaway Oil Company.
- "Site Closure and Risk Assessment Report" (SCR) dated November 28, 2000 submitted by TRC Alton Geoscience (TRC) on behalf of ExxonMobil for the subject property.

Assuming the information presented in the Hathaway Report and the SCR are accurate and representative of site conditions, the SFSFD concurs with TRC's NFA recommendation at the subject property for closure of the soil conditions subject to the following conditions:

Condition 1. Deed Restriction

A copy of a deed restriction shall be provided to the SFSFD by July 1, 2001. If the deed restriction is not finalized by this date, please call the SFSFD on or before the date with the estimated time frame for submittal.

Condition 2. Deed Restriction Use

The deed restriction shall note that the site may only be used for Office/Commercial/Industrial purposes.

While an overall NFA determination is granted by the SFSFD for closure of soil conditions at the subject site, site redevelopment activities will alter natural processes, and could expose workers and the area to concentrations of tetrachloroethene (PCE) degradation products such as vinyl chloride. This could pose extra risks to site workers during construction and construction-related activities, specifically in the area of borings SB-49 and GP-6 where elevated concentrations of PCE were detected. Precautions should be taken in the construction and construction-related activities to minimize the exposure of site workers to soil gases and/or the entrance of any soil gases to the interior of the buildings. Specifically, the following plans cited in Conditions 3 and 4 shall be submitted to the SFSFD and implemented.

Condition 3. Site Development Requirements

Prior to beginning construction activities and prior to the issuance of Building Permits the following plans shall be submitted to the SFSFD:

- Site Safety Plan to provide monitoring for petroleum hydrocarbons, PCE, and PCE-related compounds and screening for gross beta and gamma radiation during construction and construction-related activities. The results of health and safety plan monitoring shall be submitted to the SFSFD following completion of site development.

- Contingency Plan (including protocols for site monitoring and soil remediation if soil impacted with petroleum hydrocarbons, PCE and PCE-related compounds, and/or gross beta and gamma radiation are encountered). The standards cited in the SFSFD letter titled "Workplan for soil sampling at the Hathaway Lease located at 10607 Norwalk Boulevard in Santa Fe Springs, California" dated October 19, 2000 (Standards Letter) shall be used for determination as to whether soils are impacted and need to be remediated. The SFSFD is to be notified within 24-hours if any impacted soils are encountered. A report shall be prepared documenting remediation of any impacted soils. For volatile organic compound air monitoring, OSHA's Permissible Exposure Limits shall be used as the standard for site worker protection. The exposure limit for gamma and beta radiation shall comply with Title 8 of the California Code of Regulations. Any odors above this level or elevated radiation readings detected shall be immediately reported to the SFSFD.

- Building Monitoring Plan to monitor airborne concentrations of petroleum hydrocarbons, PCE, and PCE-related compounds at representative locations in each of the three planned buildings for a period of up to three months.

A copy of the SFSFD-approved Site Safety Plan and the Contingency Plan shall be available on site during construction and construction-related activities.

Condition 4. Post-Development Monitoring Requirement

Following completion of construction and construction-related activities during site development, the following shall be done:

- Building Monitoring Plan shall be implemented and a report shall be submitted to the SFSFD following completion of the Plan's activities for airborne concentrations of petroleum hydrocarbons, PCE, and PCE-related compounds. SFSFD's receipt of the Building Monitoring Plan report would conclude the condition for monitoring at the site, provided the airborne concentrations of monitored constituents are found to be consistent with ambient air concentrations, or less than ambient air and/or applicable regulatory standards. Should hazardous levels of air borne contaminates be detected, a mitigation plan shall be submitted to the SFSFD and subject to approval by the City of Santa Fe Springs.

Condition 5. Disclosure

The SFSFD understands that Norwalk SFS LLC is under contract to purchase the above referenced property. As a part of any future transactions involving future tenants, purchaser, and/or contractors ("Interested Parties"), Norwalk SFS LLC ("Owner") will provide disclosure documentation that includes the environmental reports submitted to the SFSFD (referenced above). In addition to that disclosure, Owner shall provide the information in Attachment 1 to the Interested Parties.

Due to the additional time required by the SFSFD and our consultant Oak Canyon Partners to address ATC's request for a revision to the Amendment, **a fee of $840.00 is due by April 16, 2001.** Please be advised, a base fee of $420 is required for future plan submittals and provides 4 hours of review time. Any additional time spent thereafter shall be billed at a rate of $105 per hour.

This letter assumes the information presented to the SFSFD is accurate and representative of site conditions. It is noted that TRC has made a conservative assumption of foundation attenuation in their evaluation of the overall risk from vinyl chloride as well as other halogenated volatile organic compounds. However, this letter does not relieve responsible parties of any liability under the California Health and Safety Code, the State Water Code, or other applicable laws and regulations for additional or unidentified conditions at the site which could threaten public health or the environment.

Should you have any questions regarding this matter, please contact our consultant Steve Chase at (909) 621-2643 or Environmental Protection Inspector Brenda Nelson at (562) 944-9713 ext. 155.

Sincerely,

Neal Welland

Neal Welland
Fire Chief DK

NW/dk

attachment

cc: John Lovegreen
ATC
17321 Irvine Blvd., Suite 200
Tustin, CA 92780-3010

Pat Park
Hathaway Company
P.O. Box 3404
Santa Fe Springs, CA 90670

Jimmy Woo
Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Greg Chila
O' Donnell Group
3 Civic Plaza, Suite 160
Newport Beach, CA 92660
(949) 718-9393 fax

Tracy Johnson
Pinto and Dubia, LLP
2 Park Plaza, Suite 300
Irvine, CA 92614
(949) 833-2067 fax

Fred Latham, City Manager

Bob Orpin, Director of Planning

Andy Lazzaretto, Planning and Development

ATTACHMENT 1

"The Property was formerly an oil-producing site which included oil wells, pipelines, a tank farm, sumps, and other items that are typically associated with oil producing sites, including releases from such operations which could include petroleum hydrocarbons and possibly volatile organic compounds (VOCs).

Site cleanup and remediation was conducted in 2000 with the oversight of the City of Santa Fe Springs Fire Department (City FD). Following completion of the remediation activities the City FD issued a no further action letter (NFA). To the best of Owner's knowledge, the site has been remediated and no petroleum hydrocarbons and/or VOCs remain in near-surface soils. However, as a condition of the NFA, the Owner has agreed with the City FD that any party who performs any excavation and/or other subsurface work at the Property is to be provided written notice to monitor the excavations for petroleum hydrocarbons and VOCs.

Prior to obtaining permits that involve excavation, you are required to contact the City FD to find out whether you are required to submit a Health and Safety Plan and/or prepare a Contingency Plan to address impacted soil during excavation and/or subsurface work.

In addition, future owners, tenants, sub-tenants, contractors, and sub-contractors shall be notified of this information."

California Regional Water Quality Control Board
Los Angeles Region
(50 Years Serving Coastal Los Angeles and Ventura Counties)

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov/rwqcb4

Gray Davis

March 5, 2001

Mr. Buddy Hand
ExxonMobil Environmental Remediation
Major Projects – Upstream/Coal and Minerals
601 Jefferson, KT 1244
Houston, TX 77002-79001

SLIC PROGRAM – SOIL CLOSURE
MOBIL JALK FEE PROPERTY
10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SLIC NO. 203; PCA NO.18480)

Dear Mr. Hand,

Your "Jalk Fee Soil Closure" report dated February 12, 2001, requested a soil closure for the above-referenced site. We have reviewed the following site assessment/modeling reports submitted to this Regional Board:

- "Site Closure Report and Risk Assessment" dated November 28, 2000.
- "Vapor Modeling Report Amendment to the TRC Site Closure Report and Risk Assessment" dated January 22, 2001.
- "Clarification of VaporT and Sesoil Model Input Parameters" dated February 5, 2001.
- "Jalk Fee Soil Closure" dated February 12, 2001.

The site encompasses approximately 8.8 acres of undeveloped land, located within the southwest portion of the Santa Fe Springs Oil Field. The site has been used for oil production since the 1920's, and ceased with the recent abandonment of the oil wells, pipelines, and tank farm by the current tenant, Hathaway Oil Company. Various phases of site assessment activities have been completed between 1988 to 2000. The results of the subsurface soil investigations indicate that site soils were contaminated with chlorinated and petroleum hydrocarbons.

On March 1, 1999, the Regional Board issued a soil closure for the petroleum and chlorinated hydrocarbon contamination. In November 2000, approximately 1,800 tons of hydrocarbon contaminated soils were excavated from the site, related to a pending real estate transaction. Subsequently, the Santa Fe Springs Fire Department referred the site to the Regional Board for oversight relevant to the water quality issue. Your "Site Closure Report and Risk Assessment" report dated November 28 2000, transmits information on the soil matrix confirmation sampling activities to verify cleanup of the contaminated soils and risk assessment modeling. In addition, your "Vapor Modeling Report Amendment to the TRC Site Closure Report and Risk Assessment" report dated January 22, 2001 and "Clarification of VaporT and Sesoil Model Input Parameters" report dated February 5, 2001, transmits fate and transport modeling of the contaminants to demonstrate that residual contamination would not significantly impact groundwater. Further, your "Jalk Fee Soil Closure" report dated February 12, 2001, indicate that the site is planned for development, and that approximately 95 percent of the site will be capped, further reducing any impacts to groundwater.

Based on information submitted to date, we concur with your consultant's conclusion that closure is appropriate. We have determined that the chlorinated and petroleum hydrocarbons contaminated soils have been remediated to levels satisfactory to this Regional Board and protective of groundwater. Therefore, no further action is required regarding assessment and/or remediation of the underlying soil at the subject site. However, since the groundwater beneath your site is impacted with chlorinated hydrocarbons, you are required to continue groundwater monitoring.

If you have any questions regarding this matter, please contact Mr. Jimmie Woo at (213) 576-6723 or his e-mail at jwoo@rb4.swrcb.ca.gov.

Sincerely,

Dennis A. Dickerson
Executive Officer

cc: Ms. Brenda Nelson, Santa Fe Springs Fire Department
Mr. Jeff Hensel, TRC Alton Geoscience - Irvine
Mr. Eric Walther, TCC Alton Geoscience - Irvine
Mr. Todd Stanford, TRC Alton Geoscience - Northridge

Cal/EPA

Department of Toxic Substances Control

1011 N. Grandview Avenue
Glendale, CA 91201

December 23, 1996

Pete Wilson
Governor

James M. Strock
Secretary for Environmental Protection

Mr. Tom M. Walker
Mobil Exploration & Producing
U.S., Inc.
10735 South Shoemaker Avenue
Santa Fe Springs, CA 90670

Dear Mr. Walker:

MOBIL - JALK FEE PROPERTY, 10607 NORWALK BLVD., SANTA FE SPRINGS DOCKET NO. HSA 94/95-024

The Department of Toxic Substances Control (DTSC) has reviewed the submitted reports titled: Preliminary Endangerment Assessment (PEA) Equivalent by McLaren/Hart, dated September 9, 1996 and the Subsurface Soil Investigation by Levine-Fricke, dated December 6, 1991. These reports were submitted to document the hazardous substance characterization and cleanup actions taken at the subject Site. The Site known as the Jalk Fee Property is located at: 10607 Norwalk Boulevard, Santa Fe Springs, California. More specifically, the Site is defined as the 150 foot by 150 foot area of the property formerly known as the "boneyard". The "boneyard" is located in the southwestern corner of the 8.8 acre property. The Site is that small portion of the entire property identified by the Los Angeles County Tax Assessor as Parcel 008, Map No. 025, Book 8009. DTSC did not participate in the development of the workplans for these studies and did not provide field oversight of their implementation.

Pursuant to the information provided, the Site has been used as a gas production site. The reports indicate that soil sampling and analysis were conducted for the chemicals of concern: heavy metals (e.g. lead) and volatile organic compounds (e.g. perchloroethylene).

The contaminant concentrations present at the Site were evaluated pursuant to the PEA screening risk

assessment and determined not to pose a threat to human health and the environment under a residential land use scenario.

Based upon DTSC's evaluation of the reports submitted, the Site does not appear to pose a threat to human health or the environment under a residential land use scenario. Please note that this determination only applies to the 150 foot X 150 foot section of the site known as the "boneyard". Therefore, DTSC determines that no further action is necessary with respect to investigation and remediation of hazardous substances at the "boneyard". As with any real property, if previously unidentified contamination is discovered at the Site, additional assessment, investigation and/or cleanup may be required.

If you have any questions regarding this determination, please contact Lori Parnass at (818) 551-2856 or me at (818) 551-2876.

Sincerely,

Hamid Saebfar, Chief
Site Mitigation Cleanup Operations
Southern California Branch A